

WHITE RIVER SHALE OIL CORPORATION

SUITE 500 PRUDENTIAL BUILDING, 115 SOUTH MAIN STREET
SALT LAKE CITY, UTAH 84111
(801) 363-1170

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DIVISION OF
OIL, GAS & MINING

Mr. James Smith
Utah Division of Oil, Gas & Mining
State Office Building, Room 4241
Salt Lake City, UT 84114

Dear Mr. Smith:

Enclosed are the White River Shale Oil Corporation's (WRSOC) responses to the Utah Division of Oil Gas and Mining (UDOGM) permit review document questions, submitted to our office on June 30, 1982. There are a number of attachments associated with WRSOC's responses which are also enclosed for your review. The attachments are as follows:

- 1) A copy of WRSOC's Federal Lease Agreement for both Tracts Ua and Ub (Attachment #1)
- 2) A copy of WRSOC's Environmental Monitoring Manual (Attachment #2)
- 3) A copy of the Threatened and Endangered Species Clearance for the project from the U.S. Fish and Wildlife Service (Attachment #3)
- 4) A copy of the mining facilities topsoil stockpile rough grading plan (Attachment #4)
- 5) A map (Figure 1-7a) delineating the water shed area associated with WRSOC's runoff retention pond and dam
- 6) An overlay for Figure 1-3 of the permit application which indicates the location of the first four Phase I mining panels in relation to the surface facilities (This overlay is referred to as Figure 1-9a).

In addition to the attachments listed above, WRSOC has also enclosed three other documents which are intended to provide general information which we feel would be of interest to the UDOGM staff. WRSOC has enclosed a revised plot plan. This plot plan should be substituted for Figure 1-3, sheet 1 of 3, which is currently in WRSOC's permit application. The revised plot plan differs from the original plot plan in the following ways:

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- 1) The location of a proposed run-off holding and evaporation pond which is designed to accomodate the local drainage from the mine services building area.
- 2) The location of a proposed solid waste land fill and associated access road. The proposed land fill is within the Phase I processed shale disposal area.
- 3) Addition of a mine water retention pond which will be used temporarily to store water which will be needed during the construction of the mine decline and associated shafts. This pond will be utilized until a permanent water supply system is developed.
- 4) The location of a decline waste rock stockpile as well as a shaft waste rock stockpile.
- 5) Relocation of the mine site water treatment facilities. The new location is approximately 400 ft. northeast of the location indicated in the permit application.

We have also enclosed a slightly revised Phase I Overall Site Plan. This plan is designated as Figure 1-2 in the mining permit application. The revised site plan shows the location of the solid waste landfill.

Table 1-1, page 22 of the mining permit application shows the proposed Phase I mine construction schedule. However, the schedule contained in the application contains a few mistakes which were the result of drafting errors. We have enclosed a corrected Table 1-1 which indicates the actual Phase I mine construction schedule.

WRSOC would also like to take this opportunity to comment on the questions from UDOGM relating to mine abandonment. As you are aware, Phase I is only part of our overall project. As discussed in the permit application, it is the intention of WRSOC to proceed through Phase III of the project without interruption. Thus, it is anticipated that the WRSOC will be mining and processing the resources of Tracts Ua and Ub for at least the next 25 years.

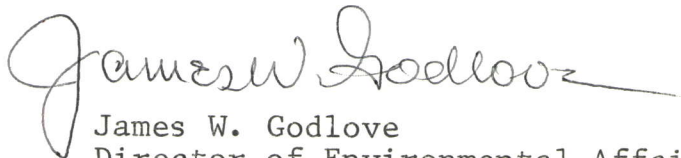
It is very difficult to cite specifics of mine and plant abandonment which will occur 25 years hence; especially when many areas of the project have not yet been designed. However, general abandonment procedures have been developed as a

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planning measure. These general procedures are contained in the mining permit application as well as in the DDP. In addition, WRSOC would like to stress the fact that our Federal lease for Tracts Ua and Ub requires that a detailed abandonment plan be developed and approved by the Oil Shale Office before being implemented. This plan will also be submitted to UDOGM for their approval before any abandonment plans are implemented.

WRSOC feels that the submittal of the enclosed documents will answer and clarify all UDOGM inquiries concerning our permit application. We look forward to approval of our permit application by the Board of Oil, Gas and Mining at their July 26, 1982 meeting. If you require any additional information, please feel free to call Mr. Ralph A. DeLeonardis for assistance.

Sincerely,

A handwritten signature in cursive script, reading "James W. Godlove", followed by a horizontal line.

James W. Godlove
Director of Environmental Affairs

RAD/mjd

Enclosures

cc: Tom Portle - UDOGM
P. A. Rutledge - OSO